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*Attorneys for Defendants Cox Communications, Inc.;
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**UNITED STATES DISTRICT COURT
 FOR THE CENTRAL DISTRICT OF CALIFORNIA**

ENTROPIC COMMUNICATIONS,
 LLC,

Plaintiff,

v.

COX COMMUNICATIONS, INC.,
 COXCOM, LLC, AND COX
 COMMUNICATIONS CALIFORNIA,
 LLC,

Defendants.

Civil Action No. 2:23-cv-01049-JWH-KES

**COX COMMUNICATIONS, INC.,
 COXCOM, LLC, AND COX
 COMMUNICATIONS CALIFORNIA,
 LLC'S APPLICATION FOR LEAVE
 TO FILE UNDER SEAL**

1 Pursuant to Local Rule 79-5, Defendants Cox Communications, Inc.,
2 CoxCom LLC, and Cox Communications California, LLC (collectively, “Cox” or
3 “Defendants”) hereby apply for leave of the Court to file under seal: (1) portions of
4 Exhibit A to the Memorandum of Points and Authorities for Cox’s Motion to for
5 Leave to Amend Answer and Rule 19 Joinder; (2) portions of ¶ 286, 289, 290, and
6 291 of Cox’s Amended Answer, and (3) portions of the Memorandum of Points and
7 Authorities for Cox’s Motion to for Leave to Amend Answer and Joinder
8 referencing the confidential information contained in Exhibit A. Exhibit A is
9 license agreement for Data Over Cable Service Interface Specifications
10 (“DOCSIS”) executed by MaxLinear Inc. Certain terms of that agreement are
11 confidential.

12 Counsel for the parties in this matter were informed of Cox’s intent to seek
13 leave to file portions of Exhibit A, portions of ¶ 286, 289, 290, and 291 of Cox’s
14 Amended Answer, and portions of the Memorandum of Points and Authorities for
15 Cox’s Motion to for Leave to Amend Answer and Joinder under seal. Specifically,
16 counsel for the parties were advised that Cox views as confidential certain terms of
17 the DOCSIS license agreement contained in Exhibit A. Plaintiff Entropic
18 Communications, LLC is still considering their position to the application to seal.

19 Redacted and unredacted versions of Exhibit A, Cox’s Amended Answer,
20 and the Memorandum of Points and Authorities for Cox’s Motion to for Leave to
21 Amend Answer and Joinder are filed herewith, as is the Declaration of Sarah
22 Kamran in Support of this Application and a Proposed Order, as required by L.R.
23 79-5.2.2(a).

24 Cox respectfully requests that the Court grant the application to file portions
25 of Exhibit A, portions of ¶ 286, 289, 290, and 291 of Cox’s Amended Answer, and
26 portions of the Memorandum of Points and Authorities for Cox’s Motion to for
27 Leave to Amend Answer and Joinder under seal.

1 DATED: August 25, 2023

Respectfully submitted,

2 KILPATRICK TOWNSEND & STOCKTON LLP

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4 By: /s/ April E. Isaacson

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